

From: [Meredith Griffin](#)
To: [Peggy Fry](#)
Subject: FW: Peoria Comments - Draft EIS
Date: Monday, February 11, 2013 11:54:53 AM
Attachments: [130207 City of Peoria DEIS Comments.pdf](#)

From: Ellen Carr
Sent: Friday, February 08, 2013 1:45 PM
To: Greg Brown; sdavis@jbreenv.com
Cc: Meredith Griffin; Joe Incardine
Subject: FW: Peoria Comments - Draft EIS

JBR – FYI. We will log this with the others, but wanted to send to you right away.

From: Shawn Kreuzwiesner [<mailto:Shawn.Kreuzwiesner@peoriaaz.gov>]
Sent: Friday, February 08, 2013 1:43 PM
To: Incardine, Joseph J; Ellen Carr; Kathleen Depukat
Cc: Chris Jacques
Subject: Peoria Comments - Draft EIS

Joe, Kathleen, Ellen

Attached are Peoria's comments on the October 2012 Draft EIS and Resource Management Plan Amendment. I have included the comments in both Word and PDF file formats to make it easier for you to process. Also included is a cover letter from our Mayor, Bob Barrett.

Sincerely,

Shawn V. Kreuzwiesner, PE, LEED Green Associate
Engineering Planning Manager
Planning and Community Development Department
City of Peoria
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 *Think of the environment...do you really need to print this e-mail?* 



Honorable Bob Barrett
Mayor

February 7, 2013

Sun Valley to Morgan Project
Attn: Joe Incardine/Kathleen Depukat
BLM Phoenix District Office
Hassayampa Field Office
21605 North 7th Avenue
Phoenix, AZ 85027-2929
Email: SunValley-Morgan@blm.gov

Re: Proposed APS Sun Valley to Morgan 500/230 kV Transmission Line
Project & Proposed RMP Amendment – Comments on Draft
Environmental Impact Statement

Dear Mr. Incardine and Ms. Depukat:

I submit these comments on behalf of the City of Peoria, Arizona ("Peoria") as its elected Mayor. Peoria is a dynamic community of more than 154,000 residents, a variety of businesses, and a multitude of recreational opportunities spread over more than 176 square miles within Maricopa and Yavapai Counties. Within Peoria's entire Planning Area of 234 square miles, we are committed to providing an environment in which Peoria's natural resources, residents, and economy are balanced.

The Peoria City Council, City staff, residents, property owners, and other community partners have been deeply involved in the APS Sun Valley to Morgan transmission line project since 2007. Peoria became a Cooperating Agency with the Bureau of Land Management ("BLM") when the two parties entered into a Memorandum of Understanding dated January 10, 2012 ("MOU"). Throughout 2012 we worked closely with BLM to ensure that the appropriate data was assembled and analyzed by BLM.

Peoria continues to appreciate the commitment of BLM to process the Application submitted by the Arizona Public Service Company ("APS") for a right-of-way to construct and operate a 500/230kV overhead transmission line from the Sun Valley Substation to the Morgan Substation ("APS Application"). As we have stated consistently throughout this process, Peoria strongly believes that the transmission line route adopted by the State of Arizona and sought by APS now (as reflected in the APS Application) is the appropriate location for the power lines through and adjacent to Peoria. (See Peoria City Council Resolution Nos. 08-97 and 2011-48, previously provided to BLM.)

Section IV(B)(2)(a) of the MOU states that Peoria “will help identify potential impacts on current and future resources and land uses within the City of Peoria's jurisdiction and will provide data and information related to land use planning, local emergency services, the history, institutions and socioeconomic conditions of the City of Peoria, environmental quality, recreation and open space planning, scenic preservation, citizen quality of life issues, cultural resources, economic development, public works, traffic and transportation, and other such information that is relevant to EIS issues or data needs.”

With this MOU provision in mind, Peoria has reviewed the Draft Environmental Impact Statement “(DEIS)” and Draft Resource Management Plan Amendment (“RMPA”) distributed by BLM in October of 2012. In submitting these comments, Peoria incorporates by reference the prior comments that Peoria has submitted to BLM concerning the APS Application, including our Public Scoping Comments dated May 25, 2011 (and attachments) and Comments on the Preliminary DEIS submitted April 3, 2012 and July 3, 2012. Peoria's comments on specific sections of the DEIS are contained in the attached using the BLM Comment Form.

Peoria also has a few important general comments on the DEIS:

1. The data compiled and analyzed in the DEIS supports the Proposed Action, which is incorporated, embodied, and reflected in the BLM Preferred Alternative.¹
2. The DEIS makes clear that Alternative 2, Alternative 3, and the No Action Alternative fail to meet NEPA's statutory standards. All three alternatives merit rejection in the EIS.
3. No other reasonable alternatives exist to be analyzed in the EIS. BLM can proceed expeditiously to complete the EIS based on the alternatives already studied.
4. Finally, Peoria would like to summarize the crucial factors that support the conclusion in the DEIS that the Proposed Action is the BLM Preferred Alternative:
 - The State of Arizona approved the power line route.
 - Broad community consensus exists for expedited approval of the APS Application.
 - The power line route complies with all existing plans at the local, county, and state levels.

¹ With the exception, explained in the attached Peoria comments, of the proposed modification of the Proposed Action to amend the RMP by designating a multiuse utility corridor on BLM lands located south of the State Route 74 Transportation Corridor.

- The power lines will provide economic benefits to the region through construction, increased renewable energy transmission, and residential, commercial, and industrial growth (leading to jobs and revenue from fees and taxes).
- The power line route is entirely within BLM's existing designated Transportation Corridor for the future freeway development of State Route 74, and BLM policies (as well as the City's) support co-location of rights-of-way within designated corridors.
- In its RMP amendment which culminated in 2008-2009, BLM did not consider designating a utility corridor along State Route 74, so this is the first time that BLM has conducted a substantive analysis of such a corridor in this location.
- The visual impacts of the power line route can be mitigated fully.
- Nearly two-thirds of the entire power line route is on State lands. Placing a portion of the route on BLM lands is consistent and compatible with the national federal energy priority established by the President, Congress, and various federal Departments, including Energy, Homeland Security, and Interior (including specifically BLM) to promote renewable energy development and protection of the nation's energy grid.
- As explained in the DEIS, Alternatives 2 and 3, as well as the No Action Alternative, each fail to satisfy these above factors.

Thank you for considering our comments. If you have any questions at this time, please contact Chris Jacques, Planning and Community Development Director, at 623-773-7209 or chris.jacques@peoriaaz.gov.

Sincerely,



Bob Barrett
Mayor

c: (w att) Dan Hay, District Chief of Staff, Office of Congressman Trent
 Franks
 Penny Pew, Constituent Services Director, Office of Congressman
 Paul Gosar
 Richard Stuhan, Arizona Public Service Company
 Chris Jacques, Planning and Community Development Director

Sun Valley to Morgan – Comment Form –DEIS – PEORIA

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Name	Page #	Chp. #	Sec. #	Line #	Comment	Comment Disposition (<i>Internal use only</i>)
City of Peoria	ES-1	ES	ES.1	All	The City previously provided comments (4/3/12 and 7/3/12) on the Preliminary Draft EIS (“PDEIS”), in which we explained that we thought the draft failed to acknowledge and address the significance of the Proposed Action route falling entirely within an existing SR74 Transportation Corridor in the RMP. We suggest that the SR74 Transportation Corridor be explained in the opening paragraph of the Executive Summary. At a minimum, it should be explained on page ES-3 in Section ES.3.2, as part of the second paragraph that discusses co-locating transportation and utility corridors.	
City of Peoria	ES-3	ES	ES.3.2	Issue 2	As we noted in our comments on the PDEIS, the draft includes this phrase: “the appropriateness of amending the RMP in such a way that would benefit developers.” The City does not understand this phrase in the context of the section and is requesting its removal.	
City of Peoria	ES-11	ES	ES.6.5		As we noted in our comments on the PDEIS, the City is confused by the attempted conclusion in the second paragraph in this Section. The first paragraph discusses BLM lands and concludes: “Because the portion of BLM lands where the land use would be affected by the Proposed Action or any of the Action Alternative routes would be relatively small, overall impacts to BLM-administered land use would be minor, regardless of alternative.” The second paragraph discusses all other lands – which includes State Lands and lands owned by many different private parties. Then BLM attempts to conclude: “Because the portion of private and State Trust lands where the land use would be affected by the Proposed Action or any of the Action Alternative routes would be relatively small, overall	

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					impacts to land use would be minor, regardless of alternative.” This seems to be comparing apples to oranges – BLM as a single landowner as compared all other landowners combined. To be accurate, shouldn’t the comparison be to individual landowners, rather than grouping them all together into a single “land use impact”? A single landowner affected by an alternative could well have a <u>major</u> impact on its property. It is far too simplistic and just not accurate to claim that such impacts would be minor. A quick review of the proceedings before the Arizona Power Plant & Line Sitting Committee in 2008, as well as the voluminous information submitted to BLM during Public Scoping and now on the DEIS, will make clear how large the negative impacts would be of Alternatives 2 and 3 on certain individual landowners. The NEPA standard is “reasonably foreseeable development.” The DEIS does not appear to apply this standard. Also, under NEPA “current” is defined as a 0-10-year period. The DEIS does not appear to apply this standard.	
City of Peoria	ES-20	ES	ES.8		The data and analysis in the DEIS supports BLM’s conclusion that the Proposed Action should be the Agency Preferred Alternative. However, BLM’s proposal to amend the RMP in three respects is not clearly supported. (1) Single-use utility corridor (2) Multi-use utility corridor south of State Route 74. Note that “multi-use utility corridor” is not defined in the Glossary, Section 6.3 (see pages 6-47 and 6-48). The types of acceptable uses do not appear to be described in the DEIS. Does BLM have any pending applications for use of this land? If not,	

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					what uses does BLM envision for this “multi-use utility corridor”? (3) VRM classification change from III to IV	
City of Peoria	1-1	1	1.1.1		Statement in the middle of the second full paragraph that the transmission lines would be on “mostly non-public lands” is incorrect. Please correct to read “mostly public lands.”	
City of Peoria	1-2	1	1.1.2	3 rd Para.	As we noted in our comments on the PDEIS, we are not sure whether the intent is to relate this sentence (“In addition, the . . .) to the prior sentence (“The Director . . .). Is the intent to state that the Director’s dismissal of the protest letter to Peoria in February of 2009 included reference to the 2009 Record of Decision (ROD)? We do not recall such a reference. Also, we are not sure why this sentence about the 2009 ROD is included, but it appears that the draft omits any reference to the March 2003 letter from APS to BLM in which APS identified SR 74 as a “Preliminary Utility Corridor.”	
City of Peoria	2-36 and 2-37	2	2.7.4. 3	5 th Para.	The description of the Vistancia and Lake Pleasant Heights master-planned developments as being “proposed” does not adequately describe the zoning entitlement for the properties. Both developments have full zoning entitlements and executed Development Agreements with the City of Peoria.	
City of Peoria	2-71	2	Table 2.8.1		Under “Socioeconomics and Environmental Justice, Effects Common to All Action Alternatives – Social Values, Population and Housing,” the statement is: “No effect on housing in the Study Area expected.” This appears to be inconsistent with other descriptions in the DEIS of planned residential development that is “reasonably foreseeable” in	

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					this area (for example, Pages 4,208, 4-226 and 4-230 and 4-231). Clearly, Alternatives 2 and 3 will have significant impacts on current and reasonably foreseeable housing. Please correct this inconsistency in the DEIS.	
City of Peoria	2-72	2	Table 2.8.1		Under “Socioeconomics and Environmental Justice, Socioeconomics – Market Value Effects, Developed Property Values and Undeveloped Land Values,” long statements are made under Alternatives 2 and 3. The City is not clear how BLM is defining the terms “Developed Property” and “Undeveloped Land.” In other portions the DEIS describes planned residential development that is “reasonably foreseeable” in this area (for example, Pages 4-208, 4-226 and 4-230 and 4-231). Why then is this reasonably foreseeable development not included as “Developed Property” for purposes of the analysis summarized in this Table? None of these terms appear to be defined in the Glossary (Sec. 6.3). Also, the statements in this portion seem limited to impacts only within the 200-feet of the actual power line right-of-way, although other portions of the DEIS acknowledge both direct <u>and</u> indirect effects/impacts (those terms are defined in the Glossary). This inconsistency is confusing and should be resolved.	
City of Peoria	2-72	2	Table 2.8.1		Under “Socioeconomics and Environmental Justice, Socioeconomics – Market Value Effects, Property Taxes,” the statement under Alternatives 2 and 3 is: “New tax revenues would be the same as P.A.” This is incorrect. If the power lines were constructed within Alt. 2, the City of Peoria’s Saddleback Heights Planned Community District would need to be amended to reflect the direct and indirect impacts caused by the lines, resulting in fewer homes,	

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					which would cause the amount of property tax collected to decrease. Likewise, if the lines were constructed within Alt. 3, both the City’s Saddleback Heights PCD, Lake Pleasant Heights PCD and Vistancia PCD would need to be amended, resulting in a significantly larger decrease in property taxes collected.	
City of Peoria	2-76	2			In Linear KOP for Alternative 2, it incorrectly indicates conformance to the Peoria General Plan. The General Plan Land Use Map illustrates the proposed action. A corridor south of SR-74 is not compliant with the General Plan.	
City of Peoria	2-76	2	Table 2.8.1		Under “Visual Resources, Complies with Town of Buckeye and City of Peoria General Plan,” Alt. 2 is answered “Yes.” This is incorrect. The correct answer is “No – City of Peoria.” Alt. 2 does not comply with the Peoria General Plan. The Proposed Action complies with the Peoria General Plan.	
City of Peoria	3-55	3	3.6.3.4		The heading to this Section is “Future Planned Land Use” but then the first words under the heading read “Future and planned land uses . . .” (emphasis added). “Future” is not defined in the Glossary (Sec. 6.3). Isn’t “current” defined under NEPA as within 0-10 years? Why is “future” used in the DEIS to describe any activity occurring after the day the sentence is written? We recommend removing the word “future” in this Section.	
City of Peoria	3-55	3	Table 3.6-2		The listed and existing ‘Estates at Lakeside’ entitlement and planned community was amended in January/2013 and is now known as ‘Cholla Hills’ and should be reflected accordingly on all exhibits.	
City of Peoria	3-90 and	3	3.9.3.1		In the introductory paragraphs of this Section, the EIS should make clear that any recreation activities that would	

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	3-91				occur within the Proposed Action area also would be occurring within the existing SR-74 Transportation Corridor. By designating the Transportation Corridor in its RMP Amendments acknowledged that the State of Arizona plans to develop SR-74 into a ten-lane freeway. This fact is addressed repeatedly in the DEIS (for example, Pages 4-223, 4-224, 4-227, 4-229 (referred to as “reasonably foreseeable”), and 4-232). It will help a reader understand the impacts described later in the DEIS if the Transportation Corridor is noted in this Section.	
City of Peoria	3-94 thru 3-97	3	3.9.4. 1		In the introductory paragraphs of this Section, the EIS should make clear that any OHV recreation activities that would occur within the Proposed Action area also would be occurring within the existing SR-74 Transportation Corridor. By designating the Transportation Corridor in its RMP Amendments acknowledged that the State of Arizona plans to develop SR-74 into a ten-lane freeway. This fact is addressed repeatedly in the DEIS (for example, Pages 4-223, 4-224, 4-227, 4-229 (referred to as “reasonably foreseeable”), and 4-232). It will help a reader understand the impacts described later in the DEIS if the Transportation Corridor is noted in this Section.	
City of Peoria	3-124	3	Table 3.12.1		In the “SR74” section of this Table, the DEIS describes the dramatic increase in traffic that will occur as SR-74 is developed as a ten-lane freeway. An increase in average daily traffic trips from just over 5,000 to well over 25,000 (500%) projected for 2031 is certainly significant. Many other Sections of the DEIS seem to be written without this important fact in mind. Repeated use of terms such as “rural” to describe the area fail to acknowledge and	

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					consider that this area is about to become urbanized. A gentleman who provided oral public comments at the Phoenix public meeting on December 13, 2012 understood this perfectly, as he described how electric lines that were constructed in one-time “rural” Peoria now blend into what is now a fully “urban” environment. At most, the BLM lands north of SR-74 may remain “rural,” but the area immediately surrounding SR-74 and most everything south of that area is in the process of becoming urban. Or, as stated in Section 4.19.2 on page 4-208 of the DEIS, “urban development is encroaching.” This, as some portions of the DEIS make clear, is a “reasonably foreseeable” fact. It would help the analysis provided in the DEIS if this fact was used consistently through all portions of the document.	
City of Peoria	3-125	3	3.12.2 .1		<p>The language is inconsistent with other portions of the DEIS when it refers to the “potential” development of the SR-74 freeway. For example, on Page 4-229 the freeway is identified as “reasonably foreseeable.”</p> <p>The text and Figure 3.12-1 refer to the future regional highways in the study area. However, the future Phase 4 extension of Loop 303 to the north is not shown. This project includes extending SR74 due east along the Joy Ranch Road alignment – immediately east of the study area.</p>	
City of Peoria	3-148	3	3.14.5. 7		<p><i>Linear KOP description at top of page, 2nd line:</i></p> <p>Peoria des not believe that it is correct to identify the portion of SR74 in the study area as has having “recognized scenic values”. This implies the area may have some formal scenic designation, which is incorrect. Peoria recommends removing “recognized” from the sentence.</p>	

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City of Peoria	3.185	3	3.14.5 .9		Peoria is concerned about the use of KOP 15 as it is located of the lower end of an approach to a bridge over the CAP. The view point to the north is partially obscured by the fill material for the approach. A better view point would have been at the CAP canal or towards the northern boundary of the Vistancia development..	
City of Peoria	3-161	3	3.15.1 .3	4 th paragr aph	We area not sure why the statement “Since the 1960’s, treated effluent from metropolitan Phoenix has been delivered through some canals” needs to be included. Peoria is not aware of any irrigation canals in the study area that are delivering treated effluent and would recommend removing this sentence.	
City of Peoria	4-3 and 4-4	4	4.1.3		Peoria is not clear as to the purpose of this Section concerning the “Draft RMPA.” What is the “Draft” that is being referred to? The language then describes that the RMP “may be amended” and follows with three options. None of the options acknowledges the existing SR-74 Transportation Corridor. None of the options identifies the potential conversion of the Transportation Corridor into a Multi-Use Corridor. Why do the “options” fail to include the use of a Multi-Use Corridor? As Peoria has pointed out to BLM in the past, Map 9, the “Utility & Transportation Corridors and Communications Sites” map in the RMP only identifies “Multi-use Corridors” and “Transportation Corridors.” “Single-use utility corridors” and “multiuse utility corridors” are not identified. The Multi-use Corridor identified on RMP Map 9 for the electric transmission lines on BLM lands that parallel portions of I-17 north of Phoenix seems to be a pretty close model for the Proposed Action along SR-74. Peoria does not understand why it is not	

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					identified as a potential option. As Peoria previously noted in its May 25, 2011 public scoping comments: “In one of the confusing aspects of the RMP, BLM stated in its presentation during the public scoping meetings that the RMP does not include any utility-only corridor designations (as opposed to" transportation-only" corridors). However, BLM also stated that there is a "utility corridor" along the CAP canal. When BLM pointed out this "utility corridor" on a map, the key to the map only identified "multi-use corridors" and "transportation corridors." The term "utility corridor" does not appear anywhere on the BLM map.”	
City of Peoria	4-78 and 4-79	4	4.9.2.1		This section should also point out the long-term recreation access north of SR74 will be limited in the future when the roadway is turned into a 10-lane freeway.	
City of Peoria	4-78 and 4-79	4	4.9.2.1		Following the completion of powerlines, the recreation areas could also be impacted by future development of private or State Trust Lands located north of SR74.	
					BLM must consider the evaluation of Recreational Impacts relative to the City of Peoria approved General Plan. As represented in the City of Peoria's voter approved General Plan, the recreational uses south of SR 74 would be severely impacted by the placement of the power line south of SR 74 due to the highly integrated natural land uses on the south side of SR 74 involving schools, parks, commercial, residential and open space. By comparison, the relative recreational impact of locating the power line north of SR 74 would be much less than the location of the power lines south of SR 74.	
City of Peoria	4-96	4	Table		The City is not clear how BLM is defining the term	

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			4.10.3		“Affected Acreage” for purposes of this Table. The amounts listed for Saddleback Heights seem limited to impacts only within the 200-feet of the actual power line right-of-way, although other portions of the DEIS acknowledge both direct <u>and</u> indirect effects/impacts (for example, Pages 4-230 and 4-231). This inconsistency is confusing and should be resolved.	
City of Peoria	4-97	4	4.10.2 .2		The statement that the annual property tax revenue generated by private properties crossed by the Proposed Action is \$289,151 appears to Peoria to be far too low. Does this number include the “reasonably foreseeable” development discussed elsewhere in the DEIS?	
City of Peoria	4-99 and 4-100	4	4.10.2 .2		As Peoria noted in an earlier comment, this Section on “Effects on Recreation” should make clear that any recreation activities that would occur within the Proposed Action area also would be occurring within the existing SR-74 Transportation Corridor. By designating the Transportation Corridor in its RMP Amendments acknowledged that the State of Arizona plans to develop SR-74 into a ten-lane freeway. This fact is addressed repeatedly in the DEIS (for example, Pages 4-223, 4-224, 4-227, 4-229 (referred to as “reasonably foreseeable”), and 4-232).	
City of Peoria	4-101	4	4.10.2 .2	4 th full Para.	The note that area residents, commuters and recreationists have “rural scenic expectation” of SR74, doe not take into account that ADOT is planned to turn this into a 10-lane freeway.	
City of Peoria	4-103 thru 4-105	4	4.10.2 .2		If the power lines were constructed within Alt. 2, the City of Peoria’s Saddleback Heights Planned Community District would need to be amended to reflect the direct and indirect	

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					impacts caused by the lines, resulting in fewer homes, which would reduce property values and cause the amount of property tax collected to decrease.	
City of Peoria	4-106 thru 4-108	4	4.10.2 .2 and Table 4.10.7		Likewise, if the lines were constructed within Alt. 3, both the City’s Saddleback Heights PCD, Vistancia PCD and Lake Pleasant Heights PCD would need to be amended, resulting in a significantly larger decrease in property values and property taxes collected. The “Affected Acreage” in the Table is way too low, when considering both indirect and direct impacts/effects (as considered in other portions of the DEIS – for example, Pages 4-226 and 4-230 and 4-231).	
City of Peoria	4-125	4	4.12.2 .2		It should be described here that in a December 7, 2010 letter Arizona Department of Transportation Deputy State Engineer Robert Samour stated to BLM that “the Department does not see any conflicts with the placement of this line adjacent to our future right-of-way easement needs as identified in the ADOT SR 74 Feasibility Report, Right-of-Way Preservation.”	
City of Peoria	4-137	4	4.14.1 .2		The first full paragraph, discussing Maricopa County’s “scenic corridors.” Please add the following two sentences to provide more complete information: “Maricopa County has stated in writing that it is not opposed to the State-certificated route contained in the APS Application. In addition, evidence introduced at the State line siting hearings, including the “Maricopa County State Route 74 Scenic Corridor Guidelines” and the “Maricopa County Zoning Ordinance, Chapter 10, Section 1009, Hwy 74 Scenic Corridor,” made clear that even within the County scenic corridor, high-voltage transmission lines are	

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					contemplated and authorized.” Peoria previously provided to BLM both documents cited in the above sentence.	
City of Peoria	4-162	4	4.14.2 .5		Peoria is concerned about the use of KOP 15 as it is located of the lower end of a approach to a bridge over the CAP. The view point to the north is partially obscured by the fill material for the approach. A better view point would have been at the CAP canal or towards the northern boundary of the Vistancia development	
City of Peoria	4-203	4	4.18.8		While new access road for the power lines could lead to an increase in user-defined OHV trails, this section seems overly negative. It would seem that BLM and the OHV users could work together to revise the managed trail system north of SR74 to account for the disturbance. The DEIS and related public process has the appearance of an undue emphasis on recreational uses over other factors required by law to be considered. One example of this is the legal-size, two-sided project flyer handout provided by BLM at the public comment meetings -- why is “The Boulders Staging Area” the only non-project item identified on the first-page map? It makes no sense to identify it by name but omit the existing Transportation Corridor, the future freeway corridor along State Route 74, the reasonably foreseeable master-planned Peoria developments in the vicinity, etc. (Peoria contrasts this with Figure 3.9-1, a map of “Recreation Opportunity Spectrum” which seems to appropriately identify the location of the “Boulders OHV Staging Area”).	
City of Peoria	4-208	4	4.19.2		In this Section, the DEIS succinctly summarizes what is discussed in some other portions of the document – that the residential, commercial, transportation and other	

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					development in the Project Area is “reasonably foreseeable.” This conclusion, as noted in other Comments from Peoria herein, should be consistently applied throughout the DEIS.	
City of Peoria	4-210	4	4.19.2		As Peoria noted in our comments on the PDEIS, prior to the discussion of the Maricopa County “scenic guidelines,” BLM should explain that because SR 74 is a State highway, the State of Arizona could have designated it as a State Scenic Road under State law. State highways all across Arizona have been designated as “State Scenic Roads.” In its comments to BLM during the public scoping period in May of 2011, the City attached the then-current “Arizona Scenic Roads & Federal Lands” map produced by the Arizona Department of Transportation. The Scenic Roads map also is available on the ADOT website. SR 74 is <u>not</u> (and never has been) designated as a “State Scenic Road.” In fact, a witness testified at the Arizona Line Siting hearing that she inquired with ADOT about SR 74, and ADOT informed her that a member of the public in the past had submitted a request to designate SR 74 as a State Scenic Road and after review the State determined that the road was not worthy of such a designation. These facts should be included and emphasized in this section, prior to any mention of the Maricopa County documents.	
City of Peoria	4-216	4	4.19.7 .1		In the final paragraph on page 4-216, a correct reference is made to the City of Peoria 2010 General Plan. The DEIS will be more accurate and comprehensive if it also includes the specific land use plans adopted by the Peoria City Council as Planned Community Districts for Vistancia, Saddleback Heights, and Lake Pleasant Heights. Peoria previously	

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					provided the three PCD's to BLM in Peoria's May 25, 2011 public scoping comments.	
City of Peoria	4-217	4	Table 4.19-5		The listed and existing 'Estates at Lakeside' entitlement and planned community was amended in January/2013 and is now known as 'Cholla Hills' and should be reflected accordingly throughout the document.	
City of Peoria	4-217 and 4-218	4	4.19.7.1		Throughout this Section the DEIS discusses the reasonably foreseeable developments by writing each sentence to read that the development “would” do certain things (“change,” “transform,” “include,” etc.). To accurately reflect the conclusion that each development is reasonably foreseeable, the sentences will be more accurate if “would” is changed” to “will” in each case.	
City of Peoria	4B-1	Vol II App. 4B	2 nd row		Under City of Peoria “Community Development”, various projects are identified – some within and outside the Study Area. West Wing Mountain is specifically emphasized (outside Study Area) as a project that includes the dedication of hillside areas for open space. It would be more relevant to emphasize Saddleback Hts, Lake Pleasant Hts and Vistancia as fully-entitled projects that include specific requirements for public open space dedication. Also, as noted herein, just a reminder that 'Estates at Lakeside' is now 'Cholla Hills.'	
City of Peoria	4B-12	Vol II App. 4B			Saddleback Heights location descriptor should be just “City of Peoria” as it is wholly within the city boundaries. Additionally, project type should be planned community or some other descriptor that recognizes it is not just housing but other land uses including commercial, mixed-use and employment. Also, acreage is 5,296.	
City of Peoria	4B-12	Vol.	New		Under Vistancia, remove “(aka Entrada) “. There is no other	

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		II App. 4B			recognized name for Vistancia. Entrada is simply one of many subdivisions within Vistancia.	
City of Peoria	4B-12	Vol. II App. 4B	New		Need to include row(s) and descriptors for the Lake Pleasant Heights and Cholla Hills (formerly Estates at Lakeside) master-planned communities. Peoria Staff will provide copies of these plans.	
City of Peoria	4B-21	Vol. II App. 4B	SR-74		As we noted in our comments on the PDEIS, under “Brief Description,” in the second paragraph, second and third sentences, statements are made concerning Maricopa County’s “scenic overlay.” As explained in the comment for Page 4-210 above, facts concerning the State’s decision to not designate SR 74 as a “State Scenic Road” should be included and emphasized in this section, prior to any mention of the Maricopa County overlay.	
City of Peoria	--	Vol. II	Fig. 1.1-1		Peoria does not believe that it is relevant to the analysis in the DEIS to include the Maricopa County “Scenic Corridor” designation which lies outside of the land sought by APS in the Proposed Action. It also is irrelevant because high-voltage electric transmission lines, such as those in this project, are authorized within the Maricopa County Scenic Corridor. We recommend deleting the “Scenic Corridor” on the Project Location Map. If BLM insists on including it, then at a minimum the key on the map should clarify that it is a “ <u>Maricopa County</u> Scenic Corridor.” It is important to be consistent with other terms used in the map key, which identify the “ <u>ACC</u> Certificated Corridor” and the “ <u>BLM</u> Transportation Corridor.” As currently written, the map key is inconsistent.	
City of Peoria	_	Vol.	Fig.		It would be useful to show the planned regional Arterial	

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		II	3.12-1		roadway network within the limits of the study area on this exhibit.	
City of Peoria	4B-1	Vol. II App. 4B			Brief Description, add “ Peoria has a Municipal Planning area of approximately 233 square miles and a population of 154,065 (2010 Census)”	
City of Peoria	4B-11	Vol. II App. 4B			Please revise the description for the Quintero development to include that it is entitled for 283 dwelling units and covers 828 acres.	
City of Peoria	4B-16	Vol. II App 4B			Pleas add “Westland Park” to the list of park sites. The site contains 2 shaded playgrounds, basketball court, 2 ramadas and multi-purpose turf area. The site is 5 acres.	
City of Peoria		Vol. II	Fig. 3.6-2		Future Planned Land Use map The map does not correctly reflect Peoria’s currently adopted Land Use plan, The land plan for Saddleback Heights was changed in December 2011. The land plan for Lake Pleasant Heights was changed in December 2012, The Estate at Lakeside development was changed to ‘Cholla Hills” in January 2013 to and expanded to include an additional 244 acre parcel to the northwest of the original development.	
City of Peoria		Vol. II	Fig. 3.6-3		The information for “Existing Mines Sites” is confusing. It appears to include both currently active mines, existing mining claims with no activity and historic mining sites/claims. Peoria recently updated our land use map (Per SB1598) to include all of the currently recognized permitted (per Office of State Mining Inspector) mines. It is recommended that this data be displayed and identified	

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					with more clarity.	
City of Peoria		Vol. II	Fig. 3.15-2		<i>Groundwater Resources map</i> This map does not currently identify the “Municipal Water service Area for Peoria. It also appears to incorrectly identify the Phoenix Municipal Water service Area as extending south of SR74 to the Morgan Substation, which is inside Peoria’s city limits. Peoria will provide a current map of water service areas.	